

1 Deverie J. Christensen
2 Nevada State Bar No. 6596
3 Katlyn M. Brady
4 Nevada State Bar No. 14173
5 **JACKSON LEWIS P.C.**
6 300 South Fourth Street, Suite 900
7 Las Vegas, Nevada 89101
8 Tel: (702) 921-2460
9 Email: deverie.christensen@jacksonlewis.com
katlyn.brady@jacksonlewis.com

10 *Attorneys for Defendant*
11 *Southwest Medical Associates, Inc.*

12
13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 MARGUERITE BRATHWAITE, M.D., an
17 individual,

18 Plaintiff,

19 v.

20 SOUTHWEST MEDICAL ASSOCIATES,
21 INC., an active Nevada domestic Corporation;
22 DOES 1-10 and ROE ENTITIES 1-10,
23 inclusive.

24 Defendants.

25 Case No.: 2:22-cv-00729-JCM-NJK

26 **STIPULATION TO EXTEND THE**
27 **MARCH 8, 2024 DEADLINE TO FILE**
28 **A MOTION FOR ATTORNEY'S**
29 **FEES AND COSTS PURSUANT TO**
30 **FED. R. CIV. P. 54**

31 **First Request**

32
33 IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D.,
34 (“Plaintiff”), through her counsel F. TRAVIS BUCHANAN, ESQ., of the law firm F. TRAVIS
35 BUCHANAN, ESQ., & ASSOCIATES, PLLC., and RODNEY S. DIGGS, of the law firm IVIE
36 McNEILL WYATT PURCELL & DIGGS, and SOUTHWEST MEDICAL ASSOCIATES, INC.,
37 (“Defendant”) through its counsel JACKSON LEWIS P.C., that the current March 8, 2024, deadline
38 to file a motion for attorney's fees and costs pursuant to FRCP 54 be extended to March 29, 2024.

39
40 1. On January 24, 2024, Magistrate Judge Koppe entered a report and recommendation
41 that Defendant's Motion to Enforce Settlement be granted. ECF No. 90.

1 2. On February 23, 2024, Judge Mahan entered an order adopting Magistrate Judge
2 Koppe's report and recommendation. ECF No. 99.

3 3. Judge Mahan further ordered the parties to submit the required dismissal paperwork
4 by March 22, 2024. ECF No. 99.

5 4. Pursuant to Fed. R. Civ. P. 54(d), Defendant has until March 8, 2024, to file a motion
6 for attorney's fees and costs.

7 5. The parties are in the process of finalizing the written settlement agreement and
8 preparing the necessary dismissal documents.

9 6. The parties desire to complete this process without incurring potentially avoidable
10 additional motion practice. Accordingly, the parties hereby stipulate and agree that Defendant's
11 deadline to file a motion for attorney's fees and costs shall be extended from March 8, 2024, to
12 March 29, 2024.

13 7. This request is made in good faith and not for the purpose of delay.

14 DATED this 7th day of March, 2024

15 F. TRAVIS BUCHANAN, ESQ., & ASSOC., JACKSON LEWIS P.C.
16 PLLC

17 */s/ F. Travis Buchanan*
18 F. Travis Buchanan, Bar No. 9371
19 701 East Bridger Ave., Suite 540
20 Las Vegas, Nevada 89101

21 */s/ Deverie J. Christensen*
22 Deverie J. Christensen, Bar No. 6596
23 Katlyn M. Brady, Bar No. 14173
24 300 S. Fourth Street, Ste. 900
25 Las Vegas, Nevada 89101
26 *Attorneys for Defendant*
27 *Southwest Medical Associates, Inc.*

28 **ORDER**

29 IT IS SO ORDERED:

30 
31 UNITED STATES DISTRICT JUDGE

32 Dated: March 13, 2024